

Baruch S. Gottesman Attorney and Counselor at Law

January 20, 2011

Honorable Robert M. Levy United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Mark Kraft, Trustee v. Lincoln Benefit Life Company v. Chaim Muskat <u>Docket No. 10-civ-2018 (JG)(RML)</u>

Dear Judge Levy:

We represent Third-Party Defendant Chaim Muskat. With the consent of Andrew Hahn, attorney for Third-Party Plaintiff Lincoln Benefit Life, we request an extension of time to Answer or otherwise respond to the Third-Party Complaint.

- (1.) The Answer was originally due January 21, 2011.
- (2.) Additional time is needed for Third-Party Defendant to properly prepare its Answer or otherwise respond to the Complaint.
- (3.) Two weeks are needed (February 4, 2011).
- (4.) (5.) No previous requests for extension of time have been made
- (6.) Counsel for Third-Party Plaintiff consents. (See attached)

We therefore respectfully request that the Court extend the time to Answer the Third Party Complaint to February 4, 2011.

Respectfully Submitted,

Baruch S. Gottesman, Esq.

UNITED S'	FATES	DISTR	CT C	OURT
EASTERN	DISTR	ICT OF	NEW	YORK

MARK KRAFT, Trustee of The Marilyn Mandel Irrev. Trust DTD 6/12/05

10-Civ-02018 (JG)(RML)

Plaintiff,

STIPULATION

~ against ~

LINCOLN BENEFIT LIFE COMPANY,

Defendant / Third-Party Plaintiff,

~ against ~

CHAIM MUSKAT,

Third-Party Defendant

STIPULATION

(EXTENDING TIME FOR THIRD-PARTY DEFENDANT TO ANSWER THIRD-PARTY COMPLAINT)

We, the undersigned counsel for Defendant/Third-Party Plaintiff LINCOLN BENEFIT LIFE COMPANY and Third-Party Defendant CHAIM MUSKAT do hereby stipulate and consent to extend the time for Third-Party Defendant Chaim Muskat to Answer until on or before February 4, 2011.

3. Agreed to this 20th of January, 2011.

ANDREW HAHN Seyfarth Shaw LLP 620 Eighth Avenue New York, NY 10018

Attorneys for Third-Party Plaintiff

BARUCH S. GOTTESMAN 185-12 Union Turnpike Fresh Meadows, NY

Attorney for Third-Party Defendant